

THE HONORABLE LAUREN KING

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

N.D. by and through his parents and co-guardians M.D. and T.D., on behalf of a class of those similarly situated,

Plaintiff(s),

v.

CHRIS REYKDAL, in his capacity as the SUPERINTENDENT OF PUBLIC INSTRUCTION and OFFICE OF THE SUPERINTENDENT OF PUBLIC INSTRUCTION, a Washington State agency,

Defendants.

No. 2:22-cv-01621-LK

SECOND DECLARATION OF ALEX HAGEL IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AGREEMENT

I, Alex Hagel, declare as follows:

1. I am an associate with the law firm of Cedar Law PLLC, co-counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of Washington. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in support of Plaintiffs' uncontested Second Motion for Preliminary Approval of the Settlement Agreement.

3. On September 9, 2024, counsel for the Plaintiffs provided to OSPI a Proposed Second Motion for Preliminary Approval. On September 13, 2024, OSPI, through counsel, provided proposed revised edits; those edits have been incorporated into the final Motion that this declaration accompanies.

4. Attached hereto as **Exhibit 1** is the full and complete text of the Settlement

1 Agreement.

2 5. Attached hereto as **Exhibit 2** is the proposed template for individualized notification
3 to class members.

4 6. Attached hereto as **Exhibit 3** is the proposed template for generalized notification
5 to class members.

6 I declare under penalty of perjury under the laws of the United States of America that the foregoing
7 is true and correct.

8 Executed on 19 September, 2024 in Auburn, Washington.
9

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27



Alex Hagel